

Koch, Kristine

From: Shephard, Burt
Sent: Wednesday, March 05, 2014 4:19 PM
To: Humphrey, Chip
Cc: Koch, Kristine
Subject: FW: I've got to jump off the TCT(b) (6)

Chip,

Attached is what I sent Kristine earlier today on the DDT avian TRVs.

A little more detail. One of Jennifer's emails discusses at length LWG's interpretation of several studies, and the TRVs the LWG derived from them. Jennifer doesn't agree with the LWG's derived DDX and DDE TRVs. This doesn't matter, and is an incorrect summary of what the EPA team, including Jennifer did to select the avian DDX and DDE TRVs. The DDT TRV's were taken directly from the EPA (2007) EcoSSL guidance document. The LWG had no input into the EcoSSL document, thus, the LWG's calculations were never used by the national EPA workgroup that derived the avian DDX TRV selected by the EPA team (NOAEL = 0.227 mg/kg/day, LOAEL = 2.27 mg/kg/day), which the LWG was directed by EPA to use in the BERA in April 2008. The 0.227 and 2.27 values are the values used by LWG in the final BERA, as documented in BERA Table 8-9 of the main BERA text. Numerous studies were evaluated, compiled and ultimately used by the national EPA workgroup that prepared the DDT EcoSSL document. The Locke et al. 1966 study of DDT effects on bald eagle, that is a focus of Jennifer's concern, was used by the national EPA workgroup as one of a number of studies in deriving the 0.227 and 2.27 national DDT avian TRVs. That national panel concluded that the LOAEL TRV from Locke et al. 1966 was 5.19 mg/kg/day for a reproductive endpoint. Locke did not calculate a useable NOAEL TRV for DDT. The bald eagle TRV from Locke et al. 1966 is higher than both the EPA national workgroup NOAEL and LOAEL TRVs for DDT.

Best regards,

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"Facts are stubborn things"
- John Adams

From: Shephard, Burt
Sent: Wednesday, March 05, 2014 10:07 AM
To: Koch, Kristine
Subject: I've got to jump off the TCT call for a(b) (6)

During our meeting later today, come by my office, and I'll show you where the avian dietary TRVs in the BERA came from. They are based on an extensive literature review by EPA and others for the DDT Ecological Soil Screening Level

(EcoSSL) document. Jennifer Peterson, Jeremy Buck and Bob Gensemer were the primary preparers of the wildlife TRVs used in the Portland Harbor BERA. LWG was directed by EPA in April 2008 to use the avian TRVs the EPA team derived, which the LWG did in the final BERA. The changes ODEQ started asking for in 2012 to the TRVs would have been found by the EPA EcoSSL reviewers of the same papers if they agreed with them, which they didn't. Can't give you any more detail at the moment, you need to see the history of the avian dietary DDX and DDE TRVs to fully understand the process.

Best regards,

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